

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

GERALD REDINGTON and)	
BENNETT TOLLER,)	
on behalf of themselves and all other)	Case No. 5:07-cv-1999
persons similarly situated; and UNITED)	
STEEL, PAPER AND FORESTRY,)	
RUBBER, MANUFACTURING,)	
ENERGY, ALLIED INDUSTRIAL)	
AND SERVICE WORKERS)	
INTERNATIONAL UNION,)	
AFL-CIO/CLC,)	
)	
Plaintiffs,)	Judge John Adams
)	
v.)	
)	
THE GOODYEAR TIRE &)	
RUBBER COMPANY,)	
)	
Defendant.)	

**MOTION OF PLAINTIFF UNITED STEEL, PAPER AND FORESTRY,
RUBBER, MANUFACTURING, ENERGY, ALLIED INDUSTRIAL AND
SERVICE WORKERS INTERNATIONAL UNION, AFL-CIO/CLC
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO/CLC (“USW”) moves for final approval of the parties’ proposed class action settlement filed with the Court on October 29, 2007. (R.28.) In support of its motion, the USW submits the attached memorandum and the Supplemental Declaration of Paul Whitehead.

For the reasons stated in the USW’s memorandum and on the basis of the declarations and other evidence submitted to the Court in this action, the USW respectfully requests that the

Court approve the parties' class action settlement in its entirety.

Respectfully submitted,

/s/William T. Payne

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Service Workers International Union, AFL-CIO/CLC

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2008, I electronically filed the foregoing Motion, Memorandum and attachments with the Clerk of the Court using the ECF system which will send electronic notification to counsel of record; and I hereby certify that I deposited a copy of the foregoing document in the United States mail, postage prepaid, addressed to the any non-ECF participants.

/s/William T. Payne

William T. Payne

Counsel for Plaintiff United Steel, Paper and
Forestry, Rubber, Manufacturing, Energy, Allied
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